

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 23-11069 (CTG)
)

) (Jointly Administered)
)

**DECLARATION OF ERIN E. DEXTER IN SUPPORT OF THE FUNDS' REPLY IN
SUPPORT OF ITS MOTION *IN LIMINE* TO EXCLUDE THE EXPERT REPORT AND
TESTIMONY OF ROBERT T. CAMPBELL**

I, Erin E. Dexter, hereby declare and state as follows:

1. I am an attorney at the law firm of Milbank LLP and counsel for the Central Pennsylvania Teamsters Pension Fund Defined Benefit Plan ("Central PA Teamsters"), the International Brotherhood of Teamsters Union No. Local 710 Pension Fund ("Teamsters Local 710"), the New England Teamsters Pension Fund ("NETTI"), and the Teamsters Joint Council No. 83 of Virginia Pension Fund ("Virginia Teamsters," and together with Central PA Teamsters, Teamsters Local 710, and NETTI, the "Funds"). I make this declaration based on my own personal knowledge and if called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this declaration in support of the *Funds' Reply in Support of its Motion in Limine to Exclude the Expert Report and Testimony of Robert T. Campbell* ("Motion"), filed contemporaneously herewith.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

3. Exhibit J to the Motion and attached hereto is a true and correct copy of transcript excerpts from the September 9, 2024, expert deposition of Robert T. Campbell.

[Remainder of the page is intentionally left blank.]

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of December, 2024, in Washington, D.C.

/s/ Erin E. Dexter

Erin E. Dexter